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13 Attorneys for Plaintiffs

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 VOTING RIGHTS DEFENSE PROJECT, et
17 al.,

Case No. C-16-02739

18 Plaintiffs,

DECLARATION OF JULIA GORGONE

19 v.
20 ALEX PADILLA, et al.,

Date: 6/1/16
Time: 11:00 am
Dept: 8, Hon. William Alsup

21 Defendants.

22
23 I, JULIA GORGONE, declare:

24
25 1. I am a resident of Alameda County.

26 2. I was at the training for Alameda County poll workers on or about Thursday, May

27 12, 2016. I was given a book. I saw a video. I was trained for approximately two to

28 DECLARATION OF JULIA GORGONE

- 1 three hours on how to be a poll worker for the June 7 primary election. At the
2 training, I was told that I could ask people if they wanted an NPP ballot, and I could
3 ask them if they wanted a crossover ballot. That was the entire script.
4
5 3. However, the trainer said that I couldn't explain to the voter what was a crossover
6 ballot was. It was explained that crossing over was affiliating with that party. I asked
7 whether the voter would be NPP again at the next election and she responded that
8 yes, the crossover to that party would just be for this election. I don't know her name
9 but she was in the video we watched.
10
11 4. The trainer also said I could not explain that the crossover ballot had anything to do
12 with voting for President.
13
14 5. Nor did the trainer inform me that the four different types of NPP ballots had
15 different content with regard to the presidential race: One for all the races but
16 President, and the other included the Presidential primaries for Democrat, AIP and
17 Libertarian. I found that out later.
18
19 6. The trainer didn't know that the basic NPP ballot contains no presidential candidate.
20 Nor did my fellow poll workers that I spoke with.
21
22 7. I was told to say "I can't tell you what is on the ballot, but do you want to crossover
23 to the Democratic, American Independent or Libertarian Party or get a crossover
24 ballot?".
25
26 8. I was told not to say what was the difference between the ballots and my question of
27 whether I could show them the different ballots was not addressed other than to
28 remind me to keep the ballots in the security sleeves at all times.

1 9. I asked if the person got the NPP ballot and it didn't have their candidate on it, could
2 we get them a different type of NPP ballot at that time as it would require changing
3 the checked box on the NPP voter roll. I got no definitive answer to that question.
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6

7 I declare under penalty of perjury that the foregoing is true and correct to the best of
8 My personal knowledge. Executed in Oakland, Alameda County, California on June
9 1, 2016.

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13 JULIA GORGONE
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PLAINTIFFS' FIRST AMENDED COMPLAINT

1 Proof of Service

2

3 I am not a party to this action. On May 20, 2016, I caused a copy of the Summons and Complaint
4 and the ADR packet to be served to:

5

6 I declare under penalty of perjury that the foregoing is true and correct. Executed on May 20,
7 2016, in Oakland, California.

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10 WILLIAM M. SIMPICH

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PLAINTIFF'S OPPOSITION TO DEFENDANTS' DEMURRER